



Littler Mendelson, PC  
900 Third Avenue  
New York, NY 10022.3298

Jean L. Schmidt  
212.497.8486 direct  
212.583.9600 main  
646.417.7534 fax  
jschmidt@littler.com

April 16, 2021

**VIA ECF**

Hon. Phillip M. Halpern  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: *Emanuel v. Gap, Inc., et al.*  
Case No.: 19-cv-03617-PMH-AEK

Dear Judge Halpern:

Application granted in part. Defendant's pre-motion letter is due April 23, 2021; Plaintiff's opposition is due April 30, 2021. The parties' request to increase the page limit is denied. The April 29, 2021 conference is adjourned to May 17, 2021 at 12:00 p.m.

SO ORDERED.

  
Philip M. Halpern  
United States District Judge

Dated: White Plains, New York  
April 19, 2021

We represent Defendants Gap, Inc., Banana Republic, LLC, Michelle Russo, Toni Lynn Borowski and Gregoire Jean-Louis (collectively "Defendants") in connection with the above-referenced matter.

As your Honor is aware, Defendants intend to file a motion for summary judgment in this matter. Pursuant to Judge Smith's Case Management Order (Dkt. 101), the pre-motion letter is currently due April 19, 2021 and Plaintiffs' opposition is due April 26, 2021.

Pursuant to Rules 1(C) and (E)(vii) of your Honor's individual rules, we write jointly with Plaintiffs to request a brief extension of these dates. Specifically, the parties request that the date for Defendants' submission of their pre-motion letter be extended to April 23, 2021, and the date for Plaintiff's opposition be extended to April 30, 2021. The extension is necessary to provide sufficient time for Plaintiffs to prepare its response to Defendants' 56.1 Statement and allow time for Defendants to review Plaintiffs' response before submission of the pre-motion letter.

The parties further request to increase the page limit for the pre-motion submissions to no more than eight pages, double spaced. This request is made due to the fact this matter involves two Plaintiffs and is fact intensive.

Lastly, the parties further request an adjournment of the telephonic conference scheduled before Your Honor on April 29, 2021 at 10:00am to a date during the week of May 3, 2021, to which both parties are fully available. Both parties are available from May 3 – 6<sup>th</sup>.

We thank the Court for its time and consideration.

Respectfully submitted,

April 16, 2021  
Page 2

*/s/ Jean L. Schmidt*

Jean L. Schmidt  
cc: Paris G. Filippatos, Esq.